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October 18, 2021

VIA ELECTRONIC MAIL ONLY (henry.d.kahn@mass.gov)

Henry D. Kahn
Hearing Officer, Legal Division
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

*Re: D.P.U. 21-BSF-A4/Petition of Fitchburg Gas and Electric Light Company d/b/a
Unitil for approval of Basic Service rates for December 1, 2021 through May 31,
2022, for its small and medium customer groups*

Dear Hearing Officer Kahn:

The Cape Light Compact JPE¹ (the "Compact") hereby submits these comments in response to the Notice of Filing and Request for Comments ("Notice") issued by the Department of Public Utilities ("Department") on October 8, 2021 in the above-referenced matter. The Compact became aware of the Notice today, and thus has not had occasion to review the entirety of Unitil's subject filing. Nonetheless, the Compact believes it imperative to continue voicing its general objection to the collection of basic service related costs through electric distribution rates, such that customers on competitive supply and/or municipal aggregation are subsidizing unrecovered basic service costs.

¹ The towns of Aquinnah, Barnstable, Bourne, Brewster, Chatham, Chilmark, Dennis, Edgartown, Eastham, Falmouth, Harwich, Mashpee, Oak Bluffs, Orleans, Provincetown, Sandwich, Tisbury, Truro, West Tisbury, Wellfleet and Yarmouth, and Dukes County are organized and operating collectively as the Cape Light Compact JPE, a joint powers entity organized pursuant to G.L. c. 40, §4A ½ and G.L. c. 164, §134. The Compact is a municipal aggregator under G.L. c. 164, §134, was originally formed in 1997 and is currently organized through a Joint Powers Agreement ("JPA") executed by all of its members. The purposes of the Compact include, among other things, to negotiate the best terms and conditions for the supply and distribution of electricity for consumers on the Cape and Vineyard and to advance consumer protection and interests for the residents of the Cape and Vineyard. Compact JPA at Article II.

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The Compact fully understands that the situation presented in Unitil's filing and service territory is unique, with the City of Fitchburg's municipal aggregation plan pending, representing a potential loss of seventy-seven (77%) percent of Unitil's basic service load should the plan be approved. D.P.U. 21-BSF-A4, Comments of the Office of the Attorney General at 2 (October 6, 2021). However, the Compact requests that the Department consider other viable and appropriate ways to mitigate the rate impact to Unitil's basic service customers from this unusual situation rather than subsidizing the costs through the electric distribution rate (which serves as a barrier to retail competition).

The Compact appreciates the opportunity to provide comments on the issues set forth above.

Respectfully Submitted,

CAPE LIGHT COMPACT JPE

By its attorney,



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AEK/drb

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